

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
STT Subbase Oil Spill - E18204 - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: POLREP #19
Progress
STT Subbase Oil Spill - E18204
Z2CA
St Thomas, VI
Latitude: 18.3324693 Longitude: -64.9602165

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Date: 5/10/2018

Reporting Period:

1. Introduction

1.1 Background

Site Number:	Z2CA	Contract Number:	EP-S2-15-02
D.O. Number:	75	Action Memo Date:	
Response Authority:	OPA	Response Type:	Emergency
Response Lead:	STATE	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	3/12/2018	Start Date:	3/12/2018
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:	E18204	Reimbursable Account #:	

1.1.1 Incident Category

Emergency Response to mitigate a discharge of oil into Krum Bay.

1.1.2 Site Description

The Site consists of a chronic discharge of oil from an unknown source entering into Krum Bay. A body of oil is likely present in the shallow water table zone at the Site due to historical and recent releases to the subsurface. The oil body breaks through at the Bay but the source is located both topographically and hydraulically upgradient.

The subsurface oil is discharging to the Bay and recently volatilizing to three vaults: two on Subbase Road and the WAPA vault situated adjacent the Puma facility. The vapors in the WAPA vault periodically build up

and recently exceeded their explosive limit resulting in two flash combustion explosions. Most of the oil discharges from the subsurface soils into the adjoining the Bay, with a lesser amount discharging from a storm water outlet that drains into the Bay.

This project is being conducted under the authority of the Clean Water Act and the Oil Pollution Act of 1990 (OPA90).

1.1.2.1 Location

The site is located along Subbase Road in St Thomas, US Virgin Islands. The stormwater outlet lies in Krum Bay near the public boat ramp off Subbase Road and discharges directly to Krum Bay. In addition the oil body present in the subsurface discharges directly to Krum Bay.

1.1.2.2 Description of Threat

Oily product is entering Krum Bay and navigable waterways from an unknown source.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On Saturday, March 3, 2018 at approximately 4 pm, vapors within a concrete vault located near the USVI Fuel Services (Puma) facility in the Subbase area of St. Thomas ignited resulting in a flashover. The vault where the flashover occurred sits adjacent to the Puma facility fence line along Subbase Road. VIFS, VIPD, VITEMA, DPNR, and WAPA responded and found three concrete utility vaults containing petroleum product and water. Two utility vaults house electrical transmission lines owned by WAPA.. The remaining utility vault is an abandoned vault owned by Viya and formerly housed telecommunications lines. The two WAPA vaults and Viya vault were filled with a petroleum/water mix. DPNR contacted a local contractor to remove the oil/water mixture from the vaults. Approximately 3,900 gallons of fuel and water mixture was pumped from the vaults on Saturday.

On March 4, 2018, the USCG began investigating a sheen on Krum Bay after receiving a report of sheening in the Bay. There is a continuous discharge of an unknown petroleum product from an unknown source into Krum Bay, a navigable waterway of the United States. The discharge is occurring from groundwater seepage of petroleum product into Krum Bay as well as from a 12" storm drain pipe. Based upon the proximity of the three utility vaults, the consistency of the petroleum product observed within the vaults and Krum Bay, and the seepages of oil observed from the groundwater into Krum Bay, the incidents appear to be related.

On Monday, March 5, 2018, EPA, DPNR, VITEMA, WAPA, VIPD, VIFS, USCG and Puma were all on site investigating the source of the leak into Krum Bay and the utility vaults. DPNR and the USCG collected samples from all the tanks on the Puma facility, the iso tank stored on the Puma facility that contains materials pumped from the three utility vaults, WAPA's diesel fuel tank, Patrick Charles trucking facility (used oil tank and stained soil), and the outfall in Krum Bay for fingerprint analysis. The samples were sent to the Marine Safety Lab in Connecticut for fingerprint oil analysis to determine a match with oil source in Krum Bay.

The Patrick Charles trucking facility located along Subbase Road downgradient of the Puma facility is staging trucks alongside the roadway on an unpaved area. There is significant oil staining beneath the trucks leading to a nearby storm drain. A walk through of the Patrick Charles facility conducted on March 5th with DPNR revealed poor housekeeping and oil soaked soils at the facility. On March 6th at approximately 1440 hours, USCG and EPA observed a spill of approximately one cup of oil from one of the parked trucks onto the road surface and entering the adjacent storm sewer.

Puma contracted with a local company to remove product from the Viya vault on March 6th to prevent a future flashover. Approximately 2,600 gallons of petroleum/water mixture was removed from the vault and is currently being stored in an iso tank on Puma property. Puma has placed and is currently maintaining hard curtain boom near the outfall in Krum Bay as well as sorbent boom to capture any product on the surface of the water. In a meeting held with Puma representatives, USCG and EPA, Puma reported that on February 16, 2018, facility personnel discovered a loss of 2,354 gross gallons from Tank 32157 (Tank 57). The loss consisted of 1,494 gallons of water and 860 gallons of gasoline. According to documentation provided by Puma, the water inside Tank 57 came from a receiving pipeline during the transfer of product from the pier in Crown Bay to the terminal on February 10, 2018 as part of their normal operating procedure.

DPNR requested EPA assistance to review Puma's SPCC plan and to conduct air monitoring to determine if the vapors within the vaults was creating an unsafe work environment for responders and neighboring businesses. Air monitors were staged in front of the Department of Public Works yard, at the intersection closest to the two vaults beneath the public roadway, and one at the barricades set up to block traffic from entering the area. LEL readings were at 0% on all monitors, and occasional spikes of VOCs up to 560 ppb were observed on the monitor closest to the manholes.

On March 9, 2018, an oily liquid was observed leaking from the sanitary sewer manhole near the WAPA vault. According to an employee in the DPW yard, the pump house for the sanitary sewer was shut down on March 3rd after the flashover occurred within the WAPA utility vault which was causing the sanitary sewer to overflow. Sorbent pads were placed over the oily discharge to prevent it from entering the nearby storm drain. Once the pump house was operating, the discharge ceased.

On March 9, 2018, EPA opened the Oil Spill Liability Trust Fund (OSLTF) due to concerns that the source of the discharge into Krum Bay is from an inland source within EPA's response jurisdiction.

EPA is the lead FOSC for the response. EPA will continue to coordinate activities with DPNR.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

This action is being taken to mitigate the release of oil into navigable waters of the United States and is consistent with the Code of Federal Regulations for the USCG:

33 CFR section 154.1020 defines substantial threat of a discharge to mean "any incident or condition involving a facility that may create a risk of discharge of oil. Such incidents include, but are not limited to storage tank or piping failures, above ground or underground leaks, fires, explosions, flooding, spills contained within the facility, or other similar occurrence,

and the EPA:

40 CFR Subpart D section 300.317 National response priorities(b) Stabilizing the situation to preclude the event from worsening is the next priority. Comparable measures should be taken to stabilize a situation involving a facility, pipeline, or other source of pollution. Stabilizing the situation includes securing the source of the spill and/or removing the remaining oil from the container (vessel, tank, or pipeline) to prevent additional oil spillage, to reduce the need for follow-up response action, and to minimize adverse impact to the environment.

2.1.2 Response Actions to Date:

PC Puerto Rico, LLC dba USVI Fuel Services (PCPR) is currently maintaining hard curtain boom within Krum Bay and conducting air monitoring at all three utility vaults to determine if a life safety hazard exists. PCPR has submitted a Site Investigation Plan (SIP) in response to an Administrative Order issued by DPNR that addresses the discharge on February 16, 2018 of gasoline into the groundwater at their facility. EPA provided comments on the SIP to DPNR on April 20, 2018.

PCPR submitted a workplan on April 17, 2018 to address the explosive vapors present within the WAPA Ground Zero utility vault in response to a Unified Command meeting held on April 9, 2018. The workplan does not address the discharge in Krum Bay. EPA submitted comments on the proposed workplan to DPNR on April 30, 2018.

EPA and DPNR are continuing to investigate the source of the oil spill and discharge into Krum Bay. All actions are being coordinated with the Territorial partners in Unified Command.

2.2 Planning Section

2.2.1 Planned Response Activities

EPA will continue to work with federal and territorial partners to investigate and abate the source of the continuous discharge. A responsible party search is ongoing.

2.2.1.2 Issues

Several heavy rain events have been predicted that may increase the amount of oil discharged into Krum Bay and potentially increase the concentration of explosive vapors within the WAPA utility vault.

2.3 Logistics Section

Not applicable

2.4 Finance Section

2.4.1 Narrative

March 9, 2018 initial \$50,000 was received from NPFC.

March 25, 2018, the ceiling was increased to \$80,000.

March 26, 2018, verbal confirmation of \$100,000 ceiling increase received from NPFC. Ceiling increased to \$180,000.

April 12, 2018, the ceiling was increased to \$220,000.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$50,000.00	\$31,359.60	\$18,640.40	37.28%
TAT/START	\$30,000.00	\$19,569.00	\$10,431.00	34.77%
SERAS	\$25,000.00	\$17,000.00	\$8,000.00	32.00%
Intramural Costs				
USEPA - Direct	\$84,917.00	\$75,000.00	\$9,917.00	11.68%
USEPA - InDirect	\$30,083.00	\$0.00	\$30,083.00	100.00%
Total Site Costs				
	\$220,000.00	\$142,928.60	\$77,071.40	35.03%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

3.1 Unified Command

USEPA, Region 2
DPNR
USCG
VIPD
VIFD
VITEMA
DPW
WAPA

4. Personnel On Site

No information available at this time.

5. Definition of Terms

DPNR - Department of Planning and Natural Resources
VIFD - Virgin Islands Fire Department
VITEMA - Virgin Islands Territorial Emergency Management Agency
DPW - Department of Public Works
WAPA - Water and Power Authority
VIPD - Virgin Islands Police Department
VIWMA - Virgin Islands Waste Management Authority
NRC - National Response Center
EPA - U.S. Environmental Protection Agency
USCG - U.S. Coast Guard
ERRS - Emergency and Rapid Response Services (EPA Contractor)
SPCC - Spill Prevention, Control and Countermeasure
OSLTF - Oil Spill Liability Trust Fund
LEL - Lower Explosive Limit
VOC - Volatile Organic Compound
NPFC - National Pollution Funds Center

6. Additional sources of information

6.1 Internet location of additional information/report

Additional pollution reports, site photographs and information can be found at:
<https://response.epa.gov/subbaseoilspill>

7. Situational Reference Materials

No information available at this time.